

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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Clerk, U.S. District Court

JUL 8 2008
JUL 31 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

lcm

William Atkins

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

08CV4381
JUDGE KENNELLY
MAG. JUDGE COX

vs.

Case No: _____
(To be supplied)

Cheif Moreci John Does
Lieutenant Tucker John Does
Sergeant Mando John Does
ERT. EMERGENCE RESCUE TEAM John Does
Sergeant John Does

Sergeant John Does

(Enter above the full name of ALL

defendants in this action. Do not

use "et al." THOMAS J. DART SHERIFF SUPERVISORY. WHO CAN
NAME THE UNKNOWN OFFICERS

CHECK ONE ONLY:



COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)



COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)



OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

I. Plaintiff(s):

A. Name: William Atkins
B. List all aliases: N/A
C. Prisoner identification number: 2003-0014927
D. Place of present confinement: Cook County Jail
E. Address: 2600 S. CALIFORNIA AVENUE Chicago, IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

A. Defendant: Cheif Moreci John Does
Title: Cheif
Place of Employment: Cook County Jail
B. Defendant: Lieutenant Tucker John Does
Title: Lieutenant
Place of Employment: Cook County Jail
C. Defendant: Sergeant Manos John Does
Title: Sergeant
Place of Employment: Cook County Jail

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

Defendant E.R.T. Unit John Does

Title EMERGENCY RESCUE TEAM

Place of Employment Cook County Jail

Defendant Sergeant John Does

Title Sergeant

Place of Employment Cook County Jail

Defendant Sergeant John Does

Title Sergeant

Place of Employment Cook County Jail

Defendant Sergeant John Does

Title Sergeant

Place of Employment Cook County Jail

Defendant Thomas J. Dart

Title SHERIFF SUPERVISORY

Place of Employment Cook County Jail

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

A. Name of case and docket number: OTC 2064
OF BURGULARY Lesser in Criminal of
Resident in Burgulay

B. Approximate date of filing lawsuit: 6/21/07

C. List all plaintiffs (if you had co-plaintiffs), including any aliases: 1
William Atkins

D. List all defendants: Officer Ken Walker
Officer Linda Gutierrez
Richard A Devine
Terry Hillard

E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): U.S. Cook County

F. Name of judge to whom case was assigned: KENNELLY

G. Basic claim made: WRONGLY CONVICTED

H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): STILL PENDING

I. Approximate date of disposition: 10/26/04

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

I am the plaintiff in this case I am a pre-trial detainee who have been in a improper illegal degrading Strip searched in 3 of these Div. in Div. 2 tier H-1 2/20/ 2007 some where doing that time at 2:30 A.M Sergeant JOHN Does and other officers JOHN Does Runs in on tier H-1 doing the time plaintiff and other detainees was in bed sleeping this was did every week taking us out of the cell, into the day-room Strip us all and search over 24 of us, and at the same time searching our cells with no clothes all over the floor a mix of detainees underwear, 3 socks, tee shirts, using the same Gloves detainees side by side without curtains or blinds there detainees with bugs catch crabs Rashes and infection, Rashes the floors are infested with Rodents, dust mites and mice this is very unclean and unsanitary. They do the same thing going to Recitation Div-1-H-1 from

3-11 By Sergeant John Doe & other officers
 two time in one day, 3-11-1 with in 24 in the
 hallway, detainees are strip search the same
 with with all above side by side no blinds or
 curtains interposed with Rodents, the ~~handcuff~~
 is did out in Div 9-2 C I was moved to Div 9
 because of the ~~handcuff~~. that I never did
 get Back, and the same ~~handcuff~~ I put in on
 Div 9- and did not get any Back for the
 strip search. same thing By Sergeant John Doe
 and others I was Moved because of the ~~handcuff~~
 the plaintiff that move to Div-10-4-D, ~~etc~~
 when plaintiff got here with others he was
 strip search by C.R. & did all the above
 on March 1st 08 plaintiff and other detainees
 was strip search going to 3:30 P.M
 rec-time to the gym when we got in the
 gym Room it was A surprise strip search
 Sergeant Marcell John Doe and other C.O
 John Doe it was A surprise strip search
 Every Body get like you come in the world
 Sergeant Marcell would say JOHN Doe and
 Every one I would strip down there that don't no

take off everything in the Rec Room it is 44-48 detainees side by side no blinds or curtains all above everything on the concrete floor were there is dust mites mice Rodents very unsanitary under clothes Socks tee shirts all mix together using the same clothes to search each item plaintiff is expose to other detainees clothes, Bug, Crabs Rashes infections I end up with A Rasher that wont go away it is degrading feet on the in-fested floor.

on May 31st 08 Plaintiff and other detainees on tier 4-D Div-10 was call to Recitation at 7:30 A.M 3 it was a surprise strip search when we got down these Lieutenant Tucker who supervisory the who everything him and others Co. John Doe's saying take off everything put it on the floor were there is dust mites and mice and all type of Rodents play is unclean unsanitary people working by looking in no blinds or curtains expose to every other detainees Heintz bugs, you can catch Crabs infections and Rashes, I end up with A Rasher or something on my feet from the concrete floor, and the mix of different detainees clothes under clothes socks tee shirts also using the same clothes on every body. this is Degrading illegal without a being justify NO Reason for this at all, it is also An !

'BUSE OF power. talking to you like you A Dog !'

And on 4,28,08 plaintiff & other detainees was Strip搜查 on tier 4-D Div 10 By the E.R.T UNIT John Does and others John Does who was taking several detainees from these cells at a time to the showers and strip searching them and these cells the detainees on the showers floor 3rd feet. Wet fleals clothes on ~~the~~ the wet floor. Detainee side by side you can catch them bugs crabs rubber infection or anything people may have. All above:

This is Improper Degrading Spreading your Bullock and Squatting and Coughing three times on the floor Ban feet with hallway Ban feet in the Recreations tanked last miles and found all type of Rodents play undanitary therefore the Building is unclean detainees side by side with nothing on can catch what they may have using the same Gloves to strip and searches every one 48 detainees using no blinds or curtains. men and Women walking by looking in. I have a infection on a Rubber on my feet from this it look like it wont go away the Doctor name is Doctor Dunlap, who have been giving something for it to go away But it is still on my feet from the tame of these strip searching, and they want send me anything back on my detainees Grievance I put in to the Administration in all the division But I never get anything back. 1519 Mr. William Atkins

V. **Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

The plaintiff Requests Compensation
FOR PAIN SUFFERING HUMILIATION MENTAL
ANGUISH FOR THE RASHES OR INFECTION ON
Plaintiff FEET. DEGRADING I M PROPER
NO EXPECTATION WAS GIVING Plaintiff PRIVACY
IS VIOLATED. Plaintiff WANT THIS TO STOP IF NOT PUT UP
BLINDS OR CURTAINS, STOP BUTTOCK SPREADING AND SQUATTING
AND COUGHING

VI. The plaintiff demands that the case be tried by a jury. YES NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 6 day of 26, 2008

William Atkins
(Signature of plaintiff or plaintiffs)

William Atkins
(Print name)

2003-0014927

(I.D. Number)

2600 S. CALIFORNIA AVENUE DIV-10-4-D

P.O. BOX 089002

Chicago ill 60608
(Address)

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS

State of Illinois
County of Cook

AFFIDAVIT

I William Atkins being First duly sworn on oath, do
swear under PENALTY OF PERJURY that the following
statements are EXACT AND TRUE TO THE BEST OF MY
KNOWLEDGE.

1)

I AM THE PLAINTIFF IN THIS CASE AND I HAVE BEEN VIOLATED
OF MY CONSTITUTION RIGHTS, AS A PRE-TRIAL Detainee
Detainees are Being strip search AT ANY TIME AND EVERY
WHERE IMPROPER ILLEGAL DEGRADING strip searches.

2)

Plaintiff and other detainees in Div-1. Tier H-1. 2/20
some where doing that time at 2:30 A:M SERGEANT JOHN DOES
AND OTHER OFFICERS JOHN DOES RAN IN TO TIER H-1 DOING THE TIME
Plaintiff and other detainees was in Bed SLEEPING this was did
very week taking us out of the cells in to the DAY ROOM AND THEN
strip search 24 detainees side by side with the clothes on the
Floor NO CURTAINS OR BLINDS MINGLING A MIX OF Detainees clothes
EXPOSE TO LEISURE BUGS, YOU CAN CATCH CRABS, RUSHES, AND INFECTIONS.
Rodents of all tiny.

3)

the same thing is did there in Div-1 going and come back
From Court But it is did in the HALLWAY every week day at 5:30
A:M By SERGEANT JOHN DOES & OTHER OFFICERS JOHN DOES NO BLINDS
Side By Side Hall infested it with Rodents they have you SPREADING
Your Buttocks and Squatting and Coughing All up above mixing
Under wear socks tee-shirts using same gloves to strip searches
Every one that is going to Court that day 40-50 at one time
been strip & search our a 100 & and 50 or more at time, go to
150 that got Court out of that Div-1.

1) IN DIV-1-H-1 PLAINTIFF 3 ALL THE DETAINES WOULD BE STRIP
STRIP SEARCH 2 TIMES WITHIN THE SAME 24 HOUR AT
3-11 P.M GOING TO THE REC ROOM BY "SGT JOHN DOES" & OTHERS,
"OFFICERS JOHN DOES" CONDUCTED A ILLEGAL STRIP SEARCH.

2) IN DIV-1-H-1 # 11-TO-7:00 A.M. WHILE THE SGT JOHN DOES & OFFICERS
JOHN DOES "RUN IN ON A TIER AT 2:00 SOMETHING A.M. AND STRIP
SEARCH" THE SAME THING WITH GOING TO COURT AND AFTER
COURT WITHIN THE SAME HOURS ILLEGAL DEGRADING SEARCH
SO I WAS SAFETY THE PLAINTIFF PUT IN SEVERAL DETAINEE
GRIEVANCE, AND THEY SAFETY ME TO DIV-9 FOR AND I NEVER GOT A
GRIEVANCE BACK.

3) PLAINTIFF WAS MOVE FOR PUTTING IN TOO MANY GRIEVANCE
IN DIV-9 IT WAS THE SAME THING STRIP SEARCH BY SGT JOHN
DOES AND OFFICERS JOHN DOES ON 7-3 P.M. AND ON 3-11 P.M.
SGT JOHN DOES WITH OFFICERS JOHN DOES ALL DURING THE END OF
2007 I WAS ON 2-D AND MOVE OUT TO 2-C IN DIV-9, 4-2107
ON 11-11 A.M. DO., & SGT JOHN DOES RUN IN & STRIP SEARCH
NOT LONG WITHIN HOURS Y GO TO COURT AND YOU ARE STRIP SEARCH.

4) ALL THIS IS DID WITHOUT BLINDS & CURTAINS DETAINES
ARE SIDE BY SIDE WITH EVERYTHING OFF EXPOSE TO PEOPLE
GEIMS, & BUGS, AND CRUMBS, RASHES & OTHER INFECTIONS YOUR CLOTHES
ARE ON THE FOOL MIX ALL TOGETHER THE FOOL IS INFESTED IT WITH
RODENTS AND GEIMS FROM RATS DUST MITES AND MICES.

5) PLAINTIFF WAS MOVE FROM DIV-9 BECAUSE OF GRIEVANCE AND WAS
MOVE TO WITH OUT HEARING ANYTHING ON HIS GRIEVANCE. ON
WHO CAN NAME AND IDENTIFY UNKNOWN COOK COUNTY
JAIL OFFICERS.

6) I AM NOW IN DIV-10-H-0 PLAINTIFF AND OTHER DETAINES WAS
STRIP SEARCH MARCH 1ST 08 GYM ROOM REC TIME A 3:30 P.M
ILLEGALLY SUPERVISORY BY SERGEANT MANOS WITH OTHERS
OFFICERS WHEN PLAINTIFF GOT TO THE REC ROOM IT WAS A SURPRISE

1. Strip Search on the foot were there is dust mites, and
 mices all type of Rodents very unsanitary the
 Recration area is unclean degrading and illegal
 No Blinds or curtains expose to everyone and every thing
 Detainees are side by side doing this strip search.
 Clothes underwear socks tee shirts, using the same gloves
 to search each item expose to other people looking in to
 People detainees germs, bugs, & you can catch crabs
 catch rashes, that I have catch on my feet, & other infections
 detainees may have.

11. ON MAY 31st 08 Plaintiff and other detainees on tier
 H-D Div-10 was call to Rec Room at 7:30 A.M & it was
 a surprise strip search when we got there, it was
 Lieutenant Tucker who supervisory the other officers
 John Does maxs, Smith John Does Pope John Does Wilson
 John Does, Pickett, John Does Remonitie John Does they did
 the same as above.

12. There was no blinds or curtains strip search on the foot
 the same tool were is dust mites & mices Rodents very
 unsanitary in the Recration area is unclean degrading
 illegal expose to every one and everything striping
 detainees side by side clothes underwear socks tee shirts
 all mix together using the same gloves to search each item expose
 that the other detainees may have.

13. ON 4,28,08 Plaintiff & other detainees was strip search
 on tier H-D Div-10 by the E.R.T unit John Does who
 taking several detainees from there cell at a time to
 the wet showers and strip search them side by side
 taking everything off and put it down on the showers
 foot on the tier that is infested with Rodents crabs
 germs bugs can catch rashes and other infections
 with the mix of clothes underwear socks tee shirts using same
 gloves to search each item. Also before and after Coart
 the same thing in all above. very unsanitary very hazard to
 our health system.

plaintiff states that every time detainees are strip search they also search their cells, the only time they don't search is at court time. But still there is no blinds or curtains, every thing in your cell are mix together with the other detainee that is in the cell with you, papers and food come up missing.

13

this is against unreasonable searches and seizures. violated the fourth amendment. there was no probable cause for anying of this

14

plaintiff also states. that due process clause's protection of liberty includes, certain privacy related interests, this personal have violated the Federal constitution to the privacy Rights.

15

this is being don with no reasonable expectation for strip search of one's privacy. ; living quarters being search unjustified, there have not been no contraband this is cruel and unusual punishment in violation of the eighth amendment

16

there strip searched are not related to legitimate security needs. ; designed to harass may be and is found unconstitutional under the fourth amendment and the eighth amendment we do not have contact visits at all but, out the looking of opposite sex. Because of no curtains or blinds with the spreading.

19

OF your Buttocks AND squatting and making you
coughing three times this is cruel and unusual
punishment

20

Sheriff Thomas J. Dart is the supervisor who
knows the unknown officials.

15. Mr. William Abbott

Signed before me on this 6 day of 26 2008

William Abbott Notary Seal

Notarized under and by 735 I L C S
5/1-109. under penalty of perjury

Notarized under and by 735 ILCS
5/1-109, under penalty of perjury,
this 6 day of August, 08.

Defendant

Mr. William Etkin

Signature